

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN MILWAUKEE DIVISION**

KIMBERLY COEY,

Plaintiff,
v.
Case No.: 13-CV-1154

RACINE COUNTY,

Honorable J. P. Stadtmauer

Defendant.

JOINT MOTION TO CONTINUE

Plaintiff, Kimberly Coey, and Defendant, Racine County, jointly move this Court to continue this action pending conclusion of the settlement negotiation. The parties jointly state that they have discussed at length settlement prospects during the collaborative work on the pretrial report. Those discussions have made substantial progress. The plaintiff has proposed a dollar amount and terms and counsel for the defendant has agreed to recommend them. The defendant has certain ordinance procedures that require the proposal to first be considered at a Finance and Human Resources Committee meeting that will be held tomorrow evening on September 9th, 2014 and if settlement is recommended by that committee it would then be reduced to resolution that would be first read at the Racine County Board Meeting on September 9th and then be scheduled for a second reading and vote at the County Board meeting on September 23rd, 2014. The trial is scheduled to begin September 22nd, 2014. Consequently, the parties jointly request the trial and all pending deadlines be continued with the parties to report status of it back to this Court on Wednesday, September 24th, 2014 or earlier.

Dated this 8th day of September, 2014.

CROSS LAW FIRM, S.C.

By: s/Janice M. Pintar
Janice M. Pintar
State Bar No.: 1041821
Kelly L. Lowery
State Bar No.: 1066294
Attorneys for Kimberly Coey

JEFFREY LEAVELL, S.C.

By: /s/ Jeffrey Leavell
Jeffrey Leavell
State Bar No.: 1004734
Attorneys for Racine County

P.O. Address

723 S. Main Street
Racine, WI 53403-1211
Telephone: (262) 633-7322
Facsimile: (262) 633-7323